

**GREBEN & ASSOCIATES**

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Jan A. Greben, State Bar No. 103464  
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Attorneys for Plaintiff Wells Fargo Bank, N.A.,  
as Trustee of the Clara Poppic Trust

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

WELLS FARGO BANK, N.A., as TRUSTEE  
for the CLARA POPPIC TRUST,

Plaintiff,

vs.

KENNETH G. RENZ; ESTATE OF  
JACKSON R. DENNISON; ESTATE OF  
WILEY UMSTEAD; KAZUKO UMSTEAD;  
WON JAE YI aka MICHAEL YI; NAN Y.  
PARK; GUAN HUANG; YING ZHANG and  
SUI SONG,

Defendants.

Case No. CV 08 2561 SBA

COMPLAINT FILED: 5/21/08  
TRIAL DATE: None Set

**DECLARATION OF JENNA L.  
MOTOLA, ESQ. IN SUPPORT OF  
REQUEST TO ENTER DEFAULT OF  
NAN YOUNG PARK**

I, Jenna L. Motola, declare:

1. I am an attorney at law, duly licensed to practice before each superior court in the state of California and admitted to practice in the Northern District of California, and am an associate attorney with Greben & Associates, attorneys of record for Plaintiff Wells Fargo Bank, N.A., as Trustee of the Clara Poppic Trust. I make this declaration based upon my own personal knowledge. If called to testify, I could and would competently testify to each matter set forth herein.

2. Attached as Exhibit "A" and incorporated herein by this reference is a copy of the Proof of Service of Summons for Nan Young Park filed on July 14, 2008.



# **EXHIBIT “A”**

LA AD 402 (Rev. 02/06) Civil Summons (Page 2)

**Proof of Service**

I declare under penalty of perjury that I served the summons and complaint in this case on NAN YOUNG PARK  
by:

1462 Willowbend Way

(1) personally delivering a copy of each to the individual at this place, Beaumont, Ca. 92223; or

(2) leaving a copy of each at the individual's dwelling or usual place of abode with \_\_\_\_\_  
who resides there and is of suitable age and discretion; or


(3) delivering a copy of each to an agent authorized by appointment or by law to receive it whose name is  
\_\_\_\_\_; or

(4) returning the summons unreturned to the court clerk on \_\_\_\_\_.

My fees are \$ 75.00 for travel and \$ 23.00 for services, for a total of \$ 98.00.

Personal Service was made on July 08, 2008 at 11:35pm.

Date: July 08, 2008

  
\_\_\_\_\_  
Server's signature  
Michael J. DiVita  
Registered California Process Server  
Printed name (not title)

Michael J. DiVita  
The Justice Connection  
Post Office Box 1492  
Banning, California 92220  
(877) 45-JUSTICE  
(877) 85-JUSTICE - fax  
[www.SmallClaimsHelp.com](http://www.SmallClaimsHelp.com)

Registered California Process Server  
Riverside County #713

# **EXHIBIT “B”**

GREBEN & ASSOCIATES

ATTORNEYS AT LAW

JAN ADAM GREBEN  
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JENNA L. MOTOLA  
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TELEPHONE 916.447.4450  
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July 23, 2008

**VIA U.S. MAIL**

Nan Young Park  
1462 Willowbend Way  
Beaumont, CA 92223

**Re: Wells Fargo v Renz et al**  
**Case No.: CV 082561 EMC**

Dear Nan Young Park,

This letter is to advise you that your answer to the first amended complaint of Wells Fargo Bank, as trustee of the Clara Poppic Trust, in the above referenced matter, was due on July 18, 2008. We have attached a copy of the first amended complaint for your reference. If no answer is filed with the Court by July 30, 2008, we will have no choice but to enter your default in this matter. If you should have any questions, feel free to contact us.

Sincerely,

  
Jenna L. Motola  
GREBEN & ASSOCIATES

JLM/bh  
Enclosure